

BUTLER LAW OFFICE
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Allen D. Butler #5392
Attorney for The Butler Law Office

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

In Re:

STEVE PANDI and
EILEEN A. QUEZADA,

Debtors.

STEVE PANDI and
EILEEN A. QUEZADA,

Movants,

vs.

CLARK COUNTY TREASURER, JACK,
AND PATRICIA KELLY, BUTLER LAW
OFFICE, and INTERNAL REVENUE
SERVICE,

Respondents.

CASE NO. 2:16-bk-11585-SHG

Chapter 11

SUPPLEMENT TO
MOTION TO JOIN IN DEBTORS'
EMERGENCY MOTION TO SELL
PROPERTY FREE AND CLEAR OF
LIENS AND FOR ORDER
POSTPONING TRUSTEE'S SALE;
AND TO JOIN IN MOTION FOR
FOR AN EXPEDITED HEARING

Hearing Date: November 29, 2016
Hearing Time: 1:30 p.m.

The Butler Law Office, 2nd lien holder on the subject property of this Motion located at 3806 Rancho Niguel Parkway, Las Vegas, Clark County, Nevada, 89147, by and through its Attorney, Allen D. Butler, hereby supplements its Motion to join in Debtor's Motion to sell property free and clear of liens, as follows:

Lien-holders Jack and Patricia Kelly have filed a Response in opposition to Debtor's motion which raises several issues in response to the motion. This Supplement addresses one of those issue—the issue as to the value of the property.

Attached as Exhibits A-C are three documents which provide some basis for a valuation of the property:

Exhibit A— A printout from the Clark County Assessors office which shows a total taxable value of \$312,860.*

Exhibit B— A printout from the Zillow website which shows an estimated value of

1 \$382,310, and a listing of similar homes for sale with values from \$384,900 to
2 \$440,000.*


3 Exhibit C—A printout from the Re/Max foreclosure website which shows a value of
4 \$340,000.*

5 *The undersigned avows that these are true and accurate copies obtained from an
6 internet search on November 29, 2016.

7 Attached as Exhibit D is the Borrower Statement of Account filed by the Kelly's as
8 Exhibit C to their Response to Debtors' Motion to Continue the Automatic Stay, which
9 shows that the Principal Balance Owing was \$273,008.59.

10 Movant cannot address the other issues raised by Kellys but would respectfully
11 submit that a 30 day delay will not prejudice the lien holder and, if Debtors can in fact
12 sell the property, would pay off all liens on the property and potentially provide
13 additional funds for the estate.

14 Therefore, the Butler Law Office joins in with Debtors' Motion to Sell Property Free
15 and Clear of Liens and for an Order Postponing the Trustee's Sale.,

16
17 
18 Allen D. Butler, Esq.
Attorney for Butler Law Office

19 Copy of the foregoing emailed
20 this 29th day of November, 2016 to:

21 Office of the U.S. Trustee
22 230 N. First Avenue, Suite 204
23 Phoenix, AZ 85003-1706

24 Andrew M. Ellis
25 ANDREW M. ELLIS LAW, PLLC
26 P.O. Box 16272
Phoenix, AZ 85011-6272
Andrew.Ellis @azbar.org

27 Teresa Mattingly
28 Courtroom Deputy to the Honorable Judge Scott H. Gann

1 Teresa_Mattingly@azb.uscourts.gov

2 James F. Kahn
3 Bankruptcy legal Center
4 James.Kahn@azbar.org

5 By: 
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Exhibit A

GENERAL INFORMATION	
PARCEL NO.	163-18-713-006
OWNER AND MAILING ADDRESS	PANDI STEVE 6940 W VOLTAIRE AVE PEORIA AZ 85381
LOCATION ADDRESS CITY/UNINCORPORATED TOWN	3806 RANCHO NIGUEL PKWY SPRING VALLEY
ASSESSOR DESCRIPTION	FOOTHILLS SUB UNIT 1 AMD PLAT BOOK 75 PAGE 42 LOT 27 BLOCK 1
RECORDED DOCUMENT NO.	* 20130729:03545
RECORDED DATE	Jul 29 2013
VESTING	NS
COMMENTS	C-20130729:3546

*Note: Only documents from September 15, 1999 through present are available for viewing.

ASSESSMENT INFORMATION AND SUPPLEMENTAL VALUE	
TAX DISTRICT	417
APPRAISAL YEAR	2015
FISCAL YEAR	2016-17
SUPPLEMENTAL IMPROVEMENT VALUE	0
SUPPLEMENTAL IMPROVEMENT ACCOUNT NUMBER	N/A

REAL PROPERTY ASSESSED VALUE		
FISCAL YEAR	2015-16	2016-17
LAND	22400	22400
IMPROVEMENTS	86050	87101
PERSONAL PROPERTY	0	0
EXEMPT	0	0
GROSS ASSESSED (SUBTOTAL)	108450	109501
TAXABLE LAND+IMP (SUBTOTAL)	309857	312860
COMMON ELEMENT ALLOCATION ASSD	0	0
TOTAL ASSESSED VALUE	108450	109501
TOTAL TAXABLE VALUE	309857	312860

ESTIMATED LOT SIZE AND APPRAISAL INFORMATION	
ESTIMATED SIZE	0.17 Acres
ORIGINAL CONST. YEAR	1999
LAST SALE PRICE MONTH/YEAR	340000 7/2013
LAND USE	20.110 - Single Family Residential
DWELLING UNITS	1

PRIMARY RESIDENTIAL STRUCTURE					
1ST FLOOR SQ. FT.	1623	CASITA SQ. FT.	0	ADDN/CONV	
2ND FLOOR SQ. FT.	1218	CARPORT SQ. FT.	0	POOL	YES

3RD FLOOR SQ. FT.	0	STYLE	Two Story	SPA	YES
UNFINISHED BASEMENT SQ. FT.	0	BEDROOMS	5	TYPE OF CONSTRUCTION	Frame-Stucco
FINISHED BASEMENT SQ. FT.	0	BATHROOMS	3 FULL	ROOF TYPE	Concrete Tile
BASEMENT GARAGE SQ. FT.	0	FIREPLACE	1		
TOTAL GARAGE SQ. FT.	441				

Exhibit B



LIST FOR RENT SAVE HIDE GET UPDATES SHARE MORE ▾

City, State, or Zip



Nevada · Las Vegas · 89147 · Spring Valley · 3806 Rancho Niguel Pkwy

3806 Rancho
Niguel Pkwy,
Las Vegas, NV
89147

5 beds · 3 baths · 2,841 sqft

OFF MARKET
Zestimate®:
\$382,310
Price this home
Rent Zestimate®:
\$2,250 /mo

Is this your rental?

Get a monthly local market report with comparable rentals in your area.

☐ I own and manage this rental

☐ I manage this rental for the owner

Enter email

Subscribe

Claim this home as your residence

Home Shoppers are Waiting



124 shoppers are looking in your neighborhood and price range.

Your name

Phone

Email

I own this home and would like to ask an agent about selling 3806

Contact Agent

Or call 702-919-6912 for more info

Get a \$25 CenturyLink® Visa® Prepaid Card.

Sign up for CenturyLink® High-Speed Internet

This 2841 square foot single family home has 5 bedrooms and 3.0 bathrooms. It is located at 3806 Rancho Niguel Pkwy Las Vegas, Nevada.

FACTS

- Lot: 7,405 sqft
- Single Family
- Built in 1999
- All time views: 400
- 3 shoppers saved this home
- Cooling: Central
- Heating: Forced air
- Last sold: Jul 2013 for \$340,000
- Great solar potential
- Sun Number™: 83 ?

FEATURES

- Deck
- Fireplace
- Parking: Garage - Attached, 1 space, 441 sqft garage
- Pool

More ▾ County website See data sources

Zestimate Details

Zestimate ?

\$382,310

+\$1,922 Last 30 days

\$363K \$405K

Zestimate range

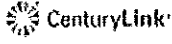

THINK YOUR ZESTIMATE IS WRONG?

\$ Get a professional estimate

Zestimate ▾ 1 year 5 years 10 years

— This home —

Spring Valley

\$25

4000 1234 5678 9010

DEBIT

CARDHOLDER NAME

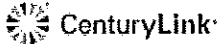
DOLLAR AMOUNT

12/12/11

1234567890123456

Online Only.

LEARN MORE



Details

Report this ad

Similar Homes for Sale



FOR SALE
\$384,900
 4 beds, 3.0 baths, 2842 s...
 9484 Borgata Bay Blvd, L...



FOR SALE
\$425,000
 4 beds, 3.0 baths, 2970 s...
 3836 Rancho Niguel Pkw...



FOR SALE
\$399,990
 5 beds, 4.0 baths, 3465 s...
 3852 Rancho Niguel Pkw...



FOR SALE
\$419,000
 5 beds, 4.0 baths, 3465 s...
 9501 Camino Capistrano...



FOR SALE
\$440,000
 4 beds, 3.0 baths, 2706 s...
 9509 Borgata Bay Blvd, L...

See listings near 3806 Rancho Niguel Pkwy

Exhibit C

   
SAVE ALERTS PLACES SHARE



\$ 340,000 Foreclosure

5 beds | 3 baths | 2,841 sqft


Status: Notice of Default (Pre-Foreclosure) 

Exhibit D

BORROWER STATEMENT OF ACCOUNT



ACCOUNT NO.	0101880000
STATEMENT DATE	10/17/2016

STATEMENT SUMMARY

Statement Period	1/1/2016 - 10/17/2016
Principal Balance	\$273,008.59
Reserve Balance	\$0.00
Impound Balance	\$116.34
Unpaid Late Charges	\$0.00
Unpaid Charges	\$224.71
Unpaid Interest	\$0.00
Regular Payment	\$3,025.07
Note Rate	5.000%
Interest Paid in 2016	\$5,966.40
Property:	3806 RANCHO NIGUEL PKWY. LAS VEGAS NV 89147-8015

BORROWER

STEVE PANDI
6940 W. VOLTAIRE AVE.
PEORIA AZ 85381

Please advise us immediately of any discrepancies in the transactions or investment activity on your statement of account or if you contemplate changing your address. When making inquiries by telephone or in writing please give your account number. We urge you to keep this statement with your investment records.

ACCOUNT ACTIVITY

Transaction Date	Pmt Due Date	Reference	Description	Transaction Amount	Interest	Principal	Late Chgs	Other	Trust	Principal Balance
			Balance Forward							\$289,153.43
4/7/2016			DEFAULT NOTICE	(\$50.00)	\$0.00	\$0.00	\$0.00	(\$50.00)	\$0.00	\$289,153.43
4/7/2016			DEFAULT POSTAGE	(\$7.71)	\$0.00	\$0.00	\$0.00	(\$7.71)	\$0.00	\$289,153.43
4/25/2016		WIRE	Payment - Other	\$3,200.00	\$0.00	\$0.00	\$0.00	\$0.00	\$3,200.00	\$289,153.43
4/25/2016			WIRE FEE	(\$25.00)	\$0.00	\$0.00	\$0.00	(\$25.00)	\$0.00	\$289,153.43
4/27/2016	6/1/2015	RESERVE	Payment - Thank You	\$0.00	\$1,204.81	\$1,145.19	\$150.00	(\$1,129.45)	(\$1,370.55)	\$288,008.24
4/27/2016		RESERVE	Late Charge	(\$150.00)	\$0.00	\$0.00	(\$150.00)	\$0.00	\$0.00	\$288,008.24
4/27/2016	7/1/2015	RESERVE	Payment - Thank You	\$0.00	\$1,200.03	\$1,299.97	\$150.00	\$208.50	(\$2,858.50)	\$286,708.27
4/27/2016		RESERVE	Late Charge	(\$150.00)	\$0.00	\$0.00	(\$150.00)	\$0.00	\$0.00	\$286,708.27
4/27/2016	8/1/2015	RESERVE	Payment - Thank You	\$0.00	\$1,194.62	\$1,305.38	\$150.00	\$208.50	(\$2,858.50)	\$285,402.89
4/27/2016		RESERVE	Late Charge	(\$150.00)	\$0.00	\$0.00	(\$150.00)	\$0.00	\$0.00	\$285,402.89
4/27/2016	4/1/2016	RESERVE	Payment - Thank You	\$0.00	\$1,189.16	\$1,461.36	\$149.46	\$208.50	(\$3,008.50)	\$283,941.53
4/27/2016		RESERVE	Late Charge	(\$149.46)	\$0.00	\$0.00	(\$149.46)	\$0.00	\$0.00	\$283,941.53
4/27/2016		WIRE	Payment - Other	\$8,185.00	\$0.00	\$0.00	\$0.00	\$0.00	\$8,185.00	\$283,941.53
4/27/2016		BK BAL ADJ	Funds Advanced	\$9,588.94	\$0.00	\$9,588.94	\$0.00	\$0.00	\$0.00	\$274,352.59
4/27/2016			REIMBURSE ATTNY FEES /	(\$12,309.63)	\$0.00	\$0.00	\$0.00	(\$12,309.63)	\$0.00	\$274,352.59
4/27/2016			REIMBURSE FED-X FEES /	(\$50.00)	\$0.00	\$0.00	\$0.00	(\$50.00)	\$0.00	\$274,352.59
4/27/2016			WIRE FEE	(\$25.00)	\$0.00	\$0.00	\$0.00	(\$25.00)	\$0.00	\$274,352.59
5/2/2016			CREDIT DEPOSIT RESERVES	\$14,000.00	\$0.00	\$0.00	\$0.00	\$14,000.00	\$0.00	\$274,352.59
5/2/2016			REIMBURSE ATTNY DEFAULT	(\$100.00)	\$0.00	\$0.00	\$0.00	(\$100.00)	\$0.00	\$274,352.59
5/13/2016			LATE NOTICE	(\$12.00)	\$0.00	\$0.00	\$0.00	(\$12.00)	\$0.00	\$274,352.59
6/2/2016			NOTICE OF DEFAULT	(\$25.00)	\$0.00	\$0.00	\$0.00	(\$25.00)	\$0.00	\$274,352.59
6/2/2016			DEFAULT POSTAGE	(\$7.71)	\$0.00	\$0.00	\$0.00	(\$7.71)	\$0.00	\$274,352.59
6/3/2016	5/1/2016	WIRE	Payment - Thank You	\$3,250.00	\$1,177.76	\$1,344.00	\$149.46	\$253.21	\$325.57	\$273,008.59
6/3/2016		WIRE	Late Charge	(\$149.46)	\$0.00	\$0.00	(\$149.46)	\$0.00	\$0.00	\$273,008.59
6/14/2016			LATE NOTICE	(\$12.00)	\$0.00	\$0.00	\$0.00	(\$12.00)	\$0.00	\$273,008.59
6/17/2016			DEFAULT NOTICE FEE	(\$25.00)	\$0.00	\$0.00	\$0.00	(\$25.00)	\$0.00	\$273,008.59
6/17/2016			DEFAULT POSTAGE	(\$7.71)	\$0.00	\$0.00	\$0.00	(\$7.71)	\$0.00	\$273,008.59
6/30/2016			FORECLOSURE DEMAND /	(\$60.00)	\$0.00	\$0.00	\$0.00	(\$60.00)	\$0.00	\$273,008.59
6/30/2016			FORECLOSURE REINSTATE OR	(\$120.00)	\$0.00	\$0.00	\$0.00	(\$120.00)	\$0.00	\$273,008.59
					\$5,966.40	\$16,144.84	\$0.00	\$912.50	\$1,614.52	

TRUST ACCOUNT ACTIVITY

Transaction Date	Check# or Reference	From Whom Received or To Whom Paid	Description / Memo	Amount Paid Out	Amount Received	Daily Balance
			Balance Forward			\$0.00
4/25/2016	WIRE	STEVE PANDI	Borrower Payment		\$3,200.00	\$3,200.00
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment		\$312.24	\$3,512.24
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment	\$1,682.79		\$1,829.45

TRUST ACCOUNT ACTIVITY						
Transaction Date	Check# or Reference	From Whom Received or To Whom Paid	Description / Memo	Amount Paid Out	Amount Received	Daily Balance
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment	\$3,184.07		(\$1,354.62)
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment		\$325.57	(\$1,029.05)
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment	\$3,184.07		(\$4,213.12)
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment		\$325.57	(\$3,887.55)
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment	\$3,334.07		(\$7,221.62)
4/27/2016	RESERVE	STEVE PANDI	Borrower Payment		\$325.57	(\$6,896.05)
4/27/2016	WIRE	STEVE PANDI	Borrower Payment		\$8,185.00	\$1,288.95
5/2/2016	TRNIMPDS	STEVE PANDI	Transfer From: PBK0880000-STEVE		\$493.07	\$1,782.02
6/3/2016	WIRE	STEVE PANDI	Borrower Payment		\$325.57	\$2,107.59
7/18/2016	110688	FARMERS INSURANCE	POLICY #98828-56-44	\$1,026.70		\$1,080.89
7/18/2016	110708	U.S. LOAN SERVICING	SERVICE FEE--INSURANCE	\$10.00		\$1,070.89
8/11/2016	111346	U.S. LOAN SERVICING	SERVICE FEE--TAX	\$10.00		\$1,060.89
8/11/2016	111346	U.S. LOAN SERVICING	SERVICE FEE--WATER	\$10.00		\$1,050.89
8/11/2016	111347	CLARK COUNTY TREASURER	APN: 163-18-713-006	\$860.34		\$390.55
8/11/2016	111347	CLARK COUNTY TREASURER	APN: 163-18-713-006 WATER	\$274.21		\$116.34
				\$13,376.25	\$13,492.59	

OUTSTANDING CHARGES AND ADVANCES							
Date of Charge	Reference	Description	Interest Rate	Original Amount	Unpaid Balance	Accrued Interest	Total Amount Due
6/14/2016		LATE NOTICE	0.000%	\$12.00	\$12.00	\$0.00	\$12.00
6/17/2016		DEFAULT NOTICE FEE	0.000%	\$25.00	\$25.00	\$0.00	\$25.00
6/17/2016		DEFAULT POSTAGE	0.000%	\$7.71	\$7.71	\$0.00	\$7.71
6/30/2016		FORECLOSURE REINSTATE OR CLOSE-OUT FEE	0.000%	\$120.00	\$120.00	\$0.00	\$120.00
6/30/2016		FORECLOSURE DEMAND / NEVADA TITLE	0.000%	\$60.00	\$60.00	\$0.00	\$60.00
				\$224.71	\$224.71	\$0.00	\$224.71